

MARK A. GOODMAN, ESQ.  
 Nevada State Bar No. 10357  
 GOODMAN LAW CENTER, P.C.  
 348 Mill Street  
 Reno, Nevada 89501  
 Telephone: (775) 473-4268  
 Facsimile: (775) 996-8787  
 Email: Mark@Goodmanlawnevada.com  
 Attorney for Defendants/Counterclaimants  
 DAN RASURE  
 WIND PUMP POWER, LLC  
 SUNFLOWER WIND, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

\* \* \* \* \*

NEVADA CONTROLS, LLC, a Nevada  
 Limited Liability Company,

Plaintiff,

v.

WIND PUMP POWER, LLC, a Kansas  
 Limited Liability Company, SUNFLOWER  
 WIND, LLC, a Kansas Limited Liability  
 Company; DAN RASURE, an individual,

Defendants.

WIND PUMP POWER, LLC, a Kansas  
 Limited Liability Company,

Counterclaimant,

v.

NEVADA CONTROLS, LLC, a Nevada  
 Limited Liability Company,

Counterdefendant.

) Case No. 3-12-cv-00068-HDM-VPC

)

) **REPLY IN SUPPORT OF**  
 ) **MOTION FOR EXTENSION OF TIME**  
 ) **FOR DEFENDANT SUNFLOWER**  
 ) **WIND, LLC, TO FILE OPPOSITION TO**  
 ) **PLAINTIFF NEVADA CONTROLS'**  
 ) **MOTION TO COMPEL**

) **Judge Howard D. McKibben**

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) **[LOCAL RULE IA 10-6]**

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COMES NOW, MARK A. GOODMAN, ESQ., of GOODMAN LAW CENTER,  
 P.C., and pursuant to Local Rule 6-1 of the Local Rules of Practice for the United States

1 District Court for the District of Nevada, herewith submits his Reply in Support of his  
2 Motion for an Order granting the Defendant, SUNFLOWER WIND, LLC (hereinafter  
3 referred to as “Sunflower Wind”), an extension of time to respond to “Plaintiff Nevada  
4 Controls’ Motion to Compel” (Docket No. 57), filed April 18, 2013, by the Plaintiff,  
5 NEVADA CONTROLS, LLC (hereinafter referred to as “Nevada Controls”).  
6

7 Sunflower Wind hereby incorporates by this reference, as if set forth *in haec verba*  
8 herein, the Reply in Support of Motion to Withdraw as Counsel for Defendant Sunflower  
9 Wind, LLC, filed simultaneously herewith.  
10

11 **POINTS AND AUTHORITIES**

12 **I**

13 **SUNFLOWER WIND SHOULD BE GRANTED AN EXTENSION OF TIME**  
14 **WITHIN WHICH TO RETAIN COUNSEL AND TO RESPOND TO NEVADA**  
15 **CONTROLS’ MOTION TO COMPEL.**  
16

17 As more fully set forth in the Reply in Support of Motion to Withdraw as Counsel  
18 for Defendant Sunflower Wind, LLC, filed simultaneously herewith, Mr. Goodman now  
19 has an obvious conflict of interest in representing Sunflower Wind; indeed, Mr. Goodman  
20 is no longer certain that he has authority to represent Sunflower Wind in the instant case.  
21

22 Therefore, Sunflower Wind should be granted an extension of time within which to  
23 retain counsel and to respond to Nevada Controls’ Motion to Compel.

24 **CONCLUSION**

25 Accordingly, it is respectfully requested that this Court issue an Order granting  
26 Defendant, SUNFLOWER WIND, LLC, an extension of time within which to retain  
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counsel and to respond to “Plaintiff Nevada Controls’ Motion to Compel.”

**RESPECTFULLY SUBMITTED, Tuesday, June 04, 2013,**

**GOODMAN LAW CENTER**

**/s/MARK A. GOODMAN, ESQ.**

Attorney for Defendant,  
SUNFLOWER WIND, LLC

**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that I am an agent of GOODMAN LAW CENTER, P.C., and that I caused a true and correct copy of **REPLY IN SUPPORT OF MOTION FOR EXTENSION OF TIME FOR DEFENDANT SUNFLOWER WIND, LLC, TO FILE OPPOSITION TO PLAINTIFF NEVADA CONTROLS' MOTION TO COMPEL** to be served by:

☐ (BY MAIL) on all parties in said action, by placing a true copy thereof enclosed in a sealed envelope in a designated area for outgoing mail, addressed as set forth below. At the Law Offices of Goodman Law Center, P.C., mail placed in that designated area is given the correct amount of postage and is deposited that same date in the ordinary course of business, in a United States mailbox in the City of Reno, County of Washoe, Nevada.

☐ (BY PERSONAL DELIVERY) by causing a true copy thereof to be hand delivered this date to the addressee(s) at the address(es) set forth below.

☐ (BY FACSIMILE) on the parties in said action by causing a true copy thereof to be telecopied to the number indicated after the address(es) noted below.

☐ Federal Express or other overnight delivery

☐ Reno/Carson Messenger Service

addressed, as follows:

Leigh Goddard, Esq.  
Jessica Woelfel, Esq.  
McDonald Carano Wilson LLP  
100 West Liberty Street, 10th Floor  
Post Office Box 2670  
Reno, Nevada 89505-2670

via this Court's ECF system

DATED: Tuesday, June 04, 2013.

/s/ Paula Rodriguez

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PAULA RODRIGUEZ, CLA  
Legal Assistant to Mr. Goodman